

1 PAUL S. PADDA, ESQ.
2 Nevada Bar No. 10417
3 Email: psp@paulpaddalaw.com
PAUL PADDA LAW, PLLC
4 4560 South Decatur Blvd., Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888

5 *Attorney for Plaintiff*

6 **UNITED STATES DISTRICT COURT**

7
8 **DISTRICT OF NEVADA**

9
10 VALERIE SOTO; an individual,)
11 Plaintiff)
12 vs.)
13 INFINITY HOSPICE CARE, LLC;)
14 an Arizona limited liability company,)
15 NEVADA HOSPICE AND PALLIATIVE) Case No. 2:22-cv-0632-BNW
16 CARE, INC.; a Nevada corporation,)
17 INFINITY HOSPICE CARE OF LAS VEGAS,)
18 LLC, a Nevada limited liability company,)
19 INFINITY HOSPICE CARE OF RENO, LLC;)
a Nevada limited liability company,)
SWEET HOME BELMONT, LLC;)
a Nevada limited liability company,)
DOES I-X; ROE CORPORATIONS)
AND/OR ENTITIES I-X,)
Defendants.)
22

23 **JOINT STIPULATION TO PERMIT PLAINTIFF ADDITIONAL TIME TO RESPOND**
24 **TO MOTION TO DISMISS FILED BY INIFINITY DEFENDANTS**

25 **(FIRST REQUEST)**

26 Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of
27 Civil Practice 7-1, the parties (Plaintiff and Defendants Infinity Hospice Care, LLC, Infinity

1 Hospice Care of Las Vegas, LLC, Infinity Hospice Care of Reno, LLC and Nevada Hospice and
2 Palliative Care, Inc.) hereby stipulate, subject to the Court's approval, to permit Plaintiff
3 additional time, to and until June 9, 2023, to respond to Defendants' motion to dismiss (ECF
4 No. 40). Presently, Plaintiff's response to the motion to dismiss is due on May 25, 2023. This
5 is Plaintiff's first request for an extension of time for the reasons cited herein.

6 In support of this Stipulation, the parties agree to the following:

7 1. Good cause exists to support this request for additional time. Undersigned counsel
8 for Plaintiff has been ill during the past week and has not been able to devote the time needed to
9 completing a response to the dispositive motion filed by Defendants. As a result, Plaintiff's
10 counsel has been required to continue additional deadlines in other cases in order to permit
11 sufficient time to meeting various case commitments while recuperating.

12 2. Counsel for the respective parties have communicated regarding this Stipulation and
13 agree that an extension of time to and until June 9, 2023 is appropriate under the circumstances.
14 The additional time will permit Plaintiff's counsel sufficient time to complete and file an
15 appropriate response to the pending dispositive motion.

16 The parties respectfully request the Court approve this Stipulation.

17 Respectfully submitted,

18
19 /s/ *Adam R. Knecht*

/s/ *Paul S. Padda*

20 Adam R. Knecht, Esq.
21 ALVERSON, TAYLOR & SANDERS
22 *Counsel of Infinity Defendants*

Paul S. Padda, Esq.
PAUL PADDA LAW
Counsel for Plaintiff

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24 **IT IS SO ORDERED:**

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UNITED STATES MAGISTRATE JUDGE
DATED: 6/1/2023